

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:

CASE NO. 19-50900-cag

**LEGENDARY FIELD EXHIBITIONS,
LLC, et al.,**

CHAPTER 7

DEBTORS.

COLTON SCHMIDT, et al.,

PLAINTIFFS,

ADV. PROC. NO. 19-05053-cag

v.

JUDGE CRAIG A. GARGOTTA

AAF PLAYERS, LLC, et al.,

DEFENDANTS.

**DEFENDANT THOMAS G. DUNDON'S
UNOPPOSED MOTION FOR LEAVE TO FILE IN EXCESS OF PAGE LIMITS**

Defendant Thomas G. Dundon (“Dundon”) files this Unopposed Motion for Leave to File in Excess of Page Limits for its Motion to Dismiss. To address all issues in the Motion to Dismiss sufficiently, Dundon seeks leave to extend the page limit of his dispositive motion from 20 pages to 28 pages, and respectfully submits his Unopposed Motion for Leave to Extend Page Limit.

1. Local Rule of 7007(a)(2) of the Local Court Rules of the United States Bankruptcy Court for the Western District of Texas limits dispositive motions to 20 pages.

2. The Local Rules identify “dispositive motions” as those motions “filed pursuant to FRBP 7012 and 7056.”

3. Dundon prepared his Motion to Dismiss, pursuant to Rule 7012 of the Federal Rules of Bankruptcy Procedure.

4. Good cause exists for Dundon to exceed the page limit from 20 pages to 28 pages because of the complexity of this litigation and the need to brief and address relevant law in the Fifth Circuit and multiple states, as well as the differing framework under Rules 12(b)(6) and 12(b)(1) of the Federal Rules of Civil Procedure.

5. Dundon makes this request in good faith and has endeavored to limit the Motion to Dismiss to a reasonable length. Dundon believes the requested page limit extension is warranted to cover the entire bases for which Dundon moves to dismiss all remaining causes of action in this case.

6. Plaintiffs are unopposed to this Motion so long as Plaintiffs specifically reserve any and all right to any procedural objections to Dundon's Motion to Dismiss. The parties agree that any procedural objections, are therefore, not waived by not opposing Dundon's desire to file this Motion to File in Excess of Page Limits.

WHEREFORE, Defendant Thomas G. Dundon respectfully requests that the Court grant its unopposed Motion to extend the page limit from 20 pages to 28 pages for its Motion to Dismiss, and grant such other relief as may be just.

Dated: March 31, 2022

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT
THOMAS G. DUNDON**

CERTIFICATE OF CONFERENCE

I certify on March 25, 29, and 31, 2022, I conferred with counsel for Plaintiffs regarding the contents of this motion and counsel for Plaintiffs indicated they were unopposed.

/s/ Brent D. Hockaday
Brent D. Hockaday

CERTIFICATE OF SERVICE

I certify on March 31, 2022, I served the foregoing document with the counsel of record by electronic means.

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